

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA

v.

EDWARD M. BURKE,
PETER J. ANDREWS, AND
CHARLES CUI

Case No. 19-CR-322

Hon. Robert M. Dow, Jr.

United States District Court Judge

**DEFENDANT CHARLES CUI'S UNOPPOSED MOTION
TO MODIFY TRAVEL RESTRICTIONS**

Defendant Charles Cui, by and through his undersigned counsel, respectfully moves this Honorable Court to enter an agreed order modifying the conditions of his release to allow him to travel outside the Northern District of Illinois to the state of Florida from December 18, 2019 through December 31, 2019 for the purpose of traveling with his family during the holiday season. In support of this motion, Mr. Cui states as follows:

1. On April 18, 2019, Mr. Cui was arraigned and entered a plea of not guilty. Bond was set at \$10,000.00 own recognizance, and Mr. Cui's travel was restricted to the Northern District of Illinois.

2. On July 22, 2019, the Court granted Mr. Cui's motion to modify his travel restrictions to allow Mr. Cui to travel with his family to North Carolina from July 29, 2019 through August 4, 2019 and to allow Mr. Cui to travel without date restriction to his second home in Benton Harbor, Michigan, which is located in the Western District of Michigan, which Mr. Cui visits on occasion with his family.

3. Mr. Cui respectfully seeks this Court's permission to travel with his family from the Northern District of Illinois to the state of Florida over the holiday season. His family plans on leaving on December 18, 2019 and returning on December 31, 2019.

4. Pretrial Services has previously informed counsel that Mr. Cui is not under Pretrial's supervision and that Pretrial takes no position regarding expanding Mr. Cui's travel beyond the NDIL.

5. The undersigned also conferred with the Assistant United States Attorneys handling this matter. The Government has indicated it has no objection to the relief sought in this motion.

6. Consistent with the Court's standing order, Mr. Cui is contemporaneously submitting a proposed agreed order in electronic format to "Proposed_Order_Dow@ilnd.uscourts.gov" for the Court's consideration.

WHEREFORE, Defendant Charles Cui respectfully requests that the Court enter an Order modifying the conditions of his release to allow him to travel outside the Northern District of Illinois to the state of Florida from December 18, 2019 through December 31, 2019 for the purpose of traveling with his family.

Dated: November 27, 2019

Respectfully submitted,

By: /s/ Tinos Diamantatos

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Counsel for Defendant Charles Cui

CERTIFICATE OF SERVICE

I, Alex D. Berger, an attorney, hereby certify that a copy of the foregoing DEFENDANT CHARLES CUI'S UNOPPOSED MOTION TO MODIFY TRAVEL RESTRICTIONS was filed on November 27, 2019 using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Alex David Berger
Alex D. Berger